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13 United States of America

14 UNITED STATES DISTRICT COURT
15 FOR THE CENTRAL DISTRICT OF CALIFORNIA
16 WESTERN DIVISION

17 UNITED STATES OF AMERICA,) NO. CV 13-7437 R (PLAx)
18)
Plaintiff,)
19 v.) PROTECTIVE ORDER
20 \$628,847.00 IN U.S. CURRENCY,)
21)
Defendant.)
22)
_____))
23 BINYUE XIAO,)
24)
Claimant.)
25)
_____))

26
27 The Court having reviewed and considered the Stipulation
28 Re: Protective Order filed by the parties in this matter on

1 April 29, 2014, and good cause appearing, the Court finds and
2 ORDERS as follows:

3 1. On October 8, 2013, the government filed a complaint
4 for forfeiture. On November 1, 2013, claimant filed a statement
5 identifying right or interest to the defendant \$628,847.00 in
6 U.S. Currency and an answer.

7 2. This Stipulation and Protective Order shall govern the
8 use and disclosure of all "Discovery Material" as defined in
9 paragraph 3, furnished by Plaintiff and Claimant in depositions,
10 in response to interrogatories, requests for admissions,
11 requests for production of documents; document productions;
12 other discovery proceedings; or voluntary disclosure by
13 plaintiff or claimant in this action.

14 3. As used herein, "Discovery Material" includes, but is
15 not limited to, any document, record and other material
16 containing and/or reflecting the personal, family and/or
17 business financial assets and liabilities of claimant (i.e.,
18 bank and credit card statements, tax records, client/supplier
19 invoices, utilities' bills, etc.).

20 4. The Parties have requested Discovery Material from
21 each other that each party intends to produce in this matter,
22 some of which includes personal identification information for
23 claimant's personal, family and/or business financial assets and
24 liabilities, including but not limited to names, Social Security
25 numbers, bank and credit account numbers, driver's license
26 numbers, addresses, phone numbers, client/supplier invoices and
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1 contact information and other similar information (collectively
2 "profile information").

3 5. Only the following individuals may review the
4 unredacted Discovery Material:

- 5 a. The named Parties in the Action;
- 6 b. Counsel of record for the Parties;
- 7 c. Partners, associates, secretaries, paralegals,
8 federal, state and local law enforcement
9 officers, agents, and contractors and other such
10 personnel employed or retained by or working
11 under the supervision of said counsel who are
12 actively engaged in assisting counsel with this
13 Action; and,
- 14 d. Outside consultants, technical advisors, and
15 expert witnesses (whether designated or retained
16 as trial witnesses or not) employed or retained
17 by the Parties or their counsel.
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19 6. Unredacted profile information produced to either
20 party shall be stored in a secure manner. Within 60 days of the
21 conclusion of this matter, claimant's counsel, claimant's
22 counsel's employees, and any retained expert, must either: (1)
23 return all documents containing profile information to the
24 government, as well as all copies, and all notes, memoranda or
25 other documents containing profile information obtained from
26 documents produced in discovery, or (2) destroy the documents
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1 containing profile information and certify in writing to counsel
2 for the government that the documents have been destroyed.

3 7. A willful violation of this Protective Order by
4 claimant, his respective attorneys, or others may result in
5 contempt of court proceedings or other civil or criminal
6 sanctions.

7 IT IS SO ORDERED.

8
9 DATED: April 30, 2014



10 THE HONORABLE MANUEL L. REAL
11 UNITED STATES DISTRICT JUDGE
12

13 Presented by:

14 ANDRÉ BIROTTE JR.
15 United States Attorney
16 ROBERT E. DUGDALE
17 Assistant United States Attorney
18 Chief, Criminal Division
19 STEVEN R. WELK
20 Assistant United States Attorney
21 Chief, Asset Forfeiture Section

22 /s/ Katharine Schonbachler
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24 Assistant United States Attorney
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26 Attorneys for Plaintiff
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